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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

September 5, 2007

Ms. Shirley J. Olinger, Acting Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

RECEIVED
SEP 10 2007
EDMC

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-07-001; Class ¹1 Modification to the Hanford Facility Dangerous Waste and Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10 (Waste Treatment and Immobilization Plant), WA7890008967

0073714

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class ¹1 Modification submitted August 17, 2007. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-LAW-PCN-ENV-07-001 provides the following updated Piping and Instrumentation Diagrams:

- 24590-LAW-M6-LFP-P0001, Revision 2 for the Low Activity Waste (LAW) Melter Feed Process System Melter 1 Feed Preparation and Feed (LFP-VSL-00001, LFP-VSL-00002).
- 24590-LAW-M6-LFP-P0003, Revision 2 for the LAW Melter Feed Process System Melter 2 Feed Preparation and Feed (LFP-VSL-00003, LFP-VSL-00004).

The parties agree that during the transition period from permit drawings to engineering source drawings, items not requiring an installation inspection or inclusion in the Independent Qualified Registered Professional Engineer report may be shown in phantom. Ecology is approving the design changes identified in the Permittees' submittal. However, decisions regarding the regulation of items shown in phantom will be made at a later date. At the end of the transition period, permit submittals will contain engineering source documents and will be incorporated into the permit as described in Ecology Publication # 07-05-006 (www.ecy.wa.gov/biblio/nwp.html).



Ms. Olinger and Mr. Elkins
September 5, 2007
Page 2

If there are any questions, contact me at 509-372-7882 or Tracy Gao at 509-372-7901.

Sincerely,



Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

aah/jc
Enclosure

cc electronic w/enc:

John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: ⁴⁻⁰⁻⁸ Tank Waste Treatment Requirements ✓
Environmental Portal
USDOE-ORP Correspondence Control

Quarter Ending 9/30/07

24590-LAW-PCN-ENV-07-001

Hanford Facility RCRA Permit Modification Notification Form**Part III, Operating Unit 10****Waste Treatment and Immobilization Plant****Index**

Page 2 of 3: Hanford Facility RCRA Permit, Operating Unit 10, Waste Treatment and Immobilization Plant
Update LAW Vitrification Building Piping and Instrumentation Diagrams (P&ID) for the LAW Melter Feed
Process System Melter 1 and 2 Feed Preparation and Feed (LFP-VSL-00001, LFP-VSL-00002, LFP-VSL-
00003, and LFP-VSL-00004) in Appendix 9.2 of the Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

D. A. Klein
D. A. Klein

7/24/07
Date

S. J. Olinger
S. J. Olinger

8-17-07
Date

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Quarter Ending 9/30/07

24590-LAW-PCN-ENV-07-001

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Waste Treatment and Immobilization Plant

Permit Part & Chapter:

Part III, Operating Unit 10Description of Modification:

The purpose of this Class 1 prime modification is to update the following Piping and Instrumentation Diagrams (P&IDs) for the LAW Melter Feed Process System Melter 1 and 2 Feed Preparation and Feed (LFP-VSL-00001, LFP-VSL-00002, LFP-VSL-00003, and LFP-VSL-00004). The following permitted P&IDs are submitted to replace those currently in Appendix 9.2.

Appendix 9.2

Replace:	24590-LAW-M6-LFP-P0001, Rev. 1	With:	24590-LAW-M6-LFP-P0001, Rev. 2
	24590-LAW-M6-LFP-P0003, Rev. 1		24590-LAW-M6-LFP-P0003, Rev. 2

The referenced P&IDs are complete revisions. They incorporate changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the resolution to comments on change documents since the issuance of the last revision of the permit drawing. This modification requests Ecology approval and incorporation into the permit the specific changes to these P&IDs that are indicated by note 42 shown on the drawings. The following is a summary of significant changes on the attached drawings.

24590-LAW-M6-LFP-00001

- Added slope notation to specific lines
- Revised and added new notes
- Rerouted sample supply and return lines
- Modified ASD pump discharge line valve numbers and added magnetic flow meters as applicable
- Capped nozzle N21 and added a line number
- Rerouted overflow lines and added branches for cleanout
- Changed quality designator of drawing from CM to Q
- Added various ITS identifiers
- Reworded various off-sheet connector descriptions

24590-LAW-M6-LFP-00003

- Added slope notation to specific lines
- Revised and added new notes
- Modified ASD pump discharge line valve numbers and added magnetic flow meters as applicable
- Capped nozzle N21 and added a line number
- Rerouted overflow lines and added branches for cleanout
- Changed quality designator of drawing from CM to Q
- Removed equipment description for LFP-BULGE-00003
- Added various ITS identifiers
- Reworded various off-sheet connector descriptions

¹ Class 1 modifications requiring prior Agency approval.


² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Quarter Ending 9/30/07

24590-LAW-PCN-ENV-07-001

The following is a list of outstanding change documents that have not been incorporated into this modification:

- 24590-LAW-M6N-LFP-00021

WAC 173-303-830 Modification Class: ^{1 2}	Class 1	Class ¹ 1	Class 2	Class 3
Please mark the Modification Class:		X		
Enter Relevant WAC 173-303-830, Appendix I Modification citation number: N/A				
Enter wording of WAC 173-303-830, Appendix I Modification citation:				
In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class ¹ 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."				
Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial)		Reviewed by Ecology:		
Reason for denial:		 B. Becker-Khaleel		
		9/5/07 Date		